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 CENTRAL INTELLIGENCE AGENCY
 WASHINGTON, D.C. 20505

5 DEC 1975

Honorable Abraham Ribicoff, Chairman
 Committee on Government Operations
 United States Senate
 Washington, D.C. 20510

Dear Mr. Chairman:

This is in response to your request for our views on S. 2477, a bill which would regulate lobbying by providing for public disclosure of certain lobbying activities. Under this bill an individual or organization which meets the definition of "lobbyist" must register and file reports with the Comptroller General.

The Central Intelligence Agency was established by the National Security Act of 1947 primarily to provide policy makers with information on foreign areas and developments. It is not a policy making agency and, consequently, has not been subject to lobbying pressures. Therefore, our interest in legislation of this type has been limited to the concern that overbreadth of language could inhibit this Agency's foreign intelligence gathering mission. Specifically, we have been concerned that a broad definition of the term "lobbying" could be expansively interpreted to cover communications relating to sensitive intelligence matters between this Agency and outside persons. Disclosure of such contacts would be contrary to provisions of law which charge the Director of Central Intelligence with protection of intelligence sources and methods [50 U.S.C. 403] and which exempt CIA from other laws requiring disclosure of Agency organization and personnel [50 U.S.C. 403(g)].

This potential conflict has been raised by several other lobbying bills introduced in this Congress which have embodied broad and ambiguous definitions of the term "lobbying," namely, S. 774, S. 815, S. 2068, and S. 2167. However, S. 2477 has a more precisely defined scope which would not impinge upon the Agency's foreign intelligence mission. Therefore, we prefer the latter bill over earlier proposals. However, we defer to the Department of Justice on the overall merits of S. 2477.

The Office of Management and Budget has advised there is no objection to the submission of this report from the standpoint of the Administration's program.

Sincerely,

SIGNED

George L. Cary
 Legislative Counsel

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